



SDMS DocID 2197036



ORIGINAL

Mark T. Bauer  
Director, Environment, Health & Safety  
mark.bauer@federalmogul.com  
248-354-8912 phone  
248-354-9499 fax

November 5, 2012

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Response to U.S. Environmental Protection Agency's ("EPA") Required Submission of Information regarding the Safety Light Corporation Superfund Site, Bloomsburg, Pennsylvania

Dear Mr. Steinmetz,

On behalf of the Champion Spark Plug Company, please accept this letter as Federal-Mogul Corporation's ("Federal-Mogul") response to the EPA's Required Submission of Information concerning the Safety Light Corporation Superfund Site ("Required Submission of Information"). This response is being provided within the EPA granted 30-day extension (i.e., extension to November 6, 2012).

Federal-Mogul conducted a search of records that had been retained from the operation of the now closed Champion Spark Plug Company, Toledo, Ohio facility. In addition, we contacted and interviewed the former EHS manager that had worked at the Toledo facility from 1975 through 1998, and an employee that had worked at the Toledo facility from 1969 through 2011, during which time he served as Facilities Manager from 2001 through 2011. As a result of this records search and the interview, Federal-Mogul did not identify any records or information related to any business relationship between Champion Spark Plug Company and Safety Light Corporation or its affiliates. The only information we have related to a business relationship between Champion Spark Plug Company and United States Radium Corporation (a predecessor or affiliate of Safety Light Corporation) are the documents that were attached to the Required Submission of Information that reference disposal of ionotrons.

Sincerely,

Mark T. Bauer  
Director, EHS

Enclosure

cc: Phil Baker, EHS Manager, Federal-Mogul, Cambridge, OH  
Stephanie O'Connor, Associate General Counsel, Federal-Mogul, Southfield, MI  
Humane Zia, Esq. (EPA)

**Federal-Mogul Corporation – Response to Required Submission of Information**

1. During its search and interviews, Federal-Mogul did not identify any records or information related to any business relationship between Champion Spark Plug Company and Safety Light Corporation or its affiliates. To the best of our knowledge, the only detail Federal-Mogul has with respect to a business relationship between CSPC and Safety Light Corporation or its affiliates was provided by EPA as attachments to the Required Submission of Information (the "Attached Documents"), which attachments reference disposal of ionotrons.
2. See response to No. 1 above.
3. See response to No. 1 above.
4. The following responses are based on the Attached Documents provided by EPA and not on any other information:
  - a. 1967 and 1968.
  - b. Disposal of ionotrons.
  - c. Per the Attached Documents:
    - i. The Attached Documents reference transactions between CSPC and U.S. Radium Corporation where each transaction appears to be for the disposal of ionotrons shipped to U.S. Radium Corporation.
    - ii. The Attached Documents indicate that there were two purchase orders issued for the disposal of ionotrons. The first order, No. 40215, references disposal of 2 ionotrons for which there was a later change notice increasing the number from 2 to 3 ionotrons. The second purchase order references disposal of 2 ionotrons.
    - iii. The Attached Documents reference "ship via REA." Although there are documents from 1967 and 1968, a "shipped date" only appears on one document, and the shipped date is 3-10-67.
    - iv. The Attached Documents are already in the possession of EPA and were attached to the Required Submission of Information.
    - v. Federal-Mogul does not have the information as to the persons or parties that were involved in the transactions that took place in 1967 and 1968 at the now closed Champion Spark Plug Company Toledo, Ohio facility.
  - d. The Attached Documents reference "ship via REA." Federal-Mogul has no additional information regarding the arrangement beyond the documents attached to the EPA Required Submission of Information. Federal-Mogul is unable to provide any further information to respond to subparts i. through v. hereof.
  - e. See response to No. 4.c above.
  - f. See response to No. 1 above.
  - g. See response to No. 1 above.
  - h. See response to No. 1 above.
  - i. See response to No. 1 above.
5. See response to No.1 above.

**Federal-Mogul Corporation – Response to Required Submission of Information**

6. The following individuals were consulted:

- a. Terry Rife, former EHS Manager, Champion Spark Plug Company, Toledo, OH  
Terry E. Rife, Principal Consultant  
1852 Devonshire Dr., Wixom, MI 48393  
248.668.9857 (H) 248.207.5956 (C)
- b. Larry Shartzer, former Facilities Manager, Champion Spark Plug Company, Toledo, OH  
Federal-Mogul Corporation  
Ignition Lab Test Engineer  
47001 Port Street  
Plymouth, MI 48170  
Office 734-254-8290  
Cell 419-351-4397  
Fax 734-254-8904
- c. Ray Volz, Facilities Manager (at location where records from Toledo are stored)  
Federal-Mogul Corporation  
Facilities Manager  
6565 Wells Avenue  
St. Louis, MO 63133  
Office +1 (314) 977-0836  
Mobile: +1 (314) 409-7102

7. Federal-Mogul is not aware of any other persons who may be able to provide more detailed responses to any question in the Required Submission of Information.
8. Federal-Mogul is not aware of any other information about other parties who may have information that may assist the EPA in its investigation of the Site.
9. Federal-Mogul acquired the Champion Spark Plug Company in 1998. Prior to Federal-Mogul's acquisition of CSPC, records were sent from the closed Champion Spark Plug Company facility in Toledo, Ohio to a facility in St. Louis, Missouri. Federal-Mogul is not aware of what records existed prior to 1998, what happened to any records prior to 1998, nor is Federal-Mogul aware of the record retention policy of the Champion Spark Plug Company prior to the 1998 acquisition. Because Federal-Mogul was unable to find any responsive information to the Required Submission of Information, and we could therefore only make assumptions as to what may have happened to any responsive records, we are unable to provide any additional information for subparts a. through d. hereof.



Mark T. Bauer  
*Director, Environment, Health & Safety*  
mark.bauer@federalmogul.com  
248-354-8912 phone  
248-354-9499 fax

September 21, 2012

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Response to U.S. EPA's Required Submission of Information regarding the Safety Light Corporation Superfund Site, Bloomsburg, Pennsylvania

Dear Mr. Steinmetz,

On behalf of the Champion Spark Plug Company, please accept this letter as Federal-Mogul Corporation's ("Federal-Mogul's") acknowledgement of receipt of the U.S. Environmental Protection Agency's Required Submission of Information concerning the Safety Light Corporation Superfund Site ("Required Submission of Information"). This letter was received at Federal-Mogul's facility located in Cambridge, Ohio on September 6, 2012. As indicated in the Required Submission of Information, a response is due within 30 days of receipt of the letter. However, based on the reasons set forth below, Federal-Mogul respectfully requested that EPA grant it a 30-day extension, until November 6, 2012, to respond to the Required Submission of Information.

In the Required Submission of Information, EPA references documents related to transactions between the Champion Spark Plug Company and United States Radium Corporation. The attached documents were for transactions made in the 1960's by the Champion Spark Plug site in Toledo, Ohio. The Toledo, Ohio site is closed. Federal-Mogul is in the process of seeking to locate and retrieve the records from this closed site. It will take more than 30 days to retrieve and examine any files that were retained to determine whether and where information responsive to the Required Submission of Information exists, and to respond.

Based on the foregoing reasons, Federal-Mogul respectfully requested that it be granted an additional 30 days, until November 6, 2012, in which to respond to the Required Submission of Information. This request was granted by telephone call with Humane Zia, Esq. on September 21, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark T. Bauer'.

Mark T. Bauer  
Director, EHS

Cc: Phil Baker, EHS Mgr., F-M, Cambridge, OH  
Stephanie O'Connor, Esq., F-M, Southfield, MI  
Humane Zia, Esq. (EPA)

**Federal-Mogul World Headquarters**  
**26555 Northwestern Hwy., Southfield, Michigan 48033**

From: (248) 354-6745  
Cindy Marasco  
Federal-Mogul  
26555 NORTHWESTERN HWY

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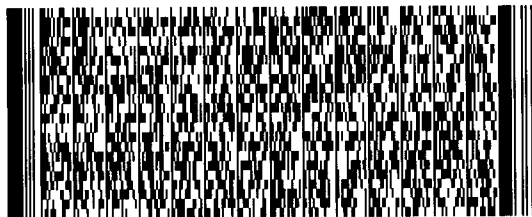
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Southfield, MI 48033

SHIP TO: (800) 438-2474  
**Harry R. Steinmetz (3HS62)**  
**US EPA - Region III**  
**1650 ARCH ST**

**BILL SENDER**

**PHILADELPHIA, PA 19103**



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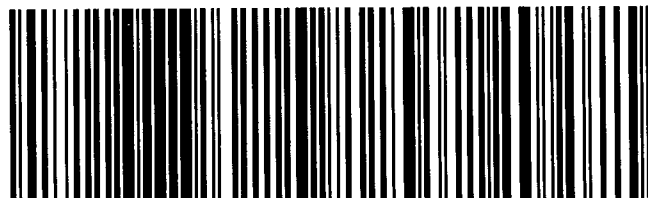
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